

REMARKS/ARGUMENTS

Applicants submit this Third Amendment (“Amendment”), together with a Supplemental Information Disclosure Statement Under 37 C.F.R. § 1.97(c) (“SIDS”) and a Petition for Extension of Time, in reply to the Office Action mailed June 2, 2005.

In this Amendment, Applicants: (1) amend the specification to improve clarity; (2) amend the Abstract of the Disclosure; (3) cancel, without prejudice or disclaimer, claims 73-75; (4) amend claims 60 and 77 to better define the claimed invention; and (5) add new claims 78-81.

Before entry of this Amendment, claims 35-77 were pending in this application. After entry of this Amendment, claims 35-72 and 76-81 are pending in this application.

The originally-filed specification, claims, abstract, and drawings fully support the amendments to the specification, the Abstract of the Disclosure, and claims 60 and 77, as well as the addition of new claims 78-81. No new matter was introduced.

In the Office Action, the Examiner objected to the Second Amendment filed March 3, 2005, under 35 U.S.C. § 132(a); rejected claims 60, 64-66, 72, 73, and 76 under 35 U.S.C. § 102(b) as being anticipated by or, in the alternative, under 35 U.S.C. § 103(a) as being obvious over Japanese Patent Document No. 08-011,508 (“JP ’508”); rejected claims 60, 64-67, and 73 under 35 U.S.C. § 102(b) as being anticipated by Japanese Patent Document No. 63-061,606 (“JP ’606”); rejected claims 60-67 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of European Patent Application No. 0,790,143 (“EP ’143”); rejected claims 68 and 69 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of EP ’143, further in view of Japanese Patent Document No. 60-193,704 (“JP ’704”) or U.S. Patent No. 5,529,101 to

Croyle et al. (“Croyle”); rejected claims 70 and 71 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of EP ’143, further in view of Japanese Patent Document No. 04-143,106 (“JP ’106”) and/or Japanese Patent Document No. 11-001,105 (“JP ’105”); rejected claim 77 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of EP ’143, further in view of JP ’704 or Croyle, and yet further in view of JP ’106 and/or JP ’105; rejected claims 72-75 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of EP ’143, further in view of U.S. Patent No. 6,478,062 to Schomburg (“Schomburg”); rejected claim 76 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of EP ’143, further in view of European Patent Application No. 0,627,332 (“EP ’332”); rejected claims 35-43, 49, 50, 52, 54, and 56 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of EP ’143, further in view of U.S. Patent No. 5,016,695 to Kuze et al. (“Kuze”) and Japanese Patent Document No. 08-197,912 (“JP ’912”); rejected claims 44 and 45 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of EP ’143, further in view of Kuze and JP ’912, and yet further in view of JP ’704 or Croyle; rejected claims 46 and 47 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of EP ’143, further in view of Kuze and JP ’912, and yet further in view of JP ’106 and/or JP ’105; rejected claims 48 and 57-59 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of EP ’143, further in view of Kuze and JP ’912, and yet further in view of United Kingdom Patent No. 1,212,795 (“GB ’795”); and rejected claim 55 under 35 U.S.C. § 103(a) as being unpatentable over JP ’606 in view of EP ’143, further in view of Kuze and JP ’912, and yet further in view of U.S. Patent No. 4,947,911 to Ushikubo et al. (“Ushikubo”).

The Examiner also stated that claims 51 and 53 would be allowable if rewritten in independent form, including all the limitations of the base claim and any intervening claims.

Allowable Subject Matter

Applicants gratefully acknowledge the Examiner's statement that claims 51 and 53 would be allowable if rewritten.

Examiner Interview

Applicants' representatives conducted an interview with the Examiner on October 13, 2005. During the interview, Applicants' representatives provided the Examiner with copies of English-language translations of JP '508 and JP '606 (duplicate copies of which are also filed, together with this Amendment, in the SIDS). Also, Applicants and the Examiner discussed claims 35, 60, and 77; Kuze, JP '508, JP '606, and JP '912; and the terms "directional", "symmetrical", "asymmetrical", "adjacent", "delimited", "substantially perpendicular", and "approximately transverse". Applicants' representatives discussed limitations of the Kuze, JP '508, JP '606, and JP '912 references, but did not propose any substantive claim amendments. No agreement was reached as to whether any claims would be allowable based on the topics discussed.

Objection Under 35 U.S.C. § 132(a)

In this Amendment, Applicants amend the Abstract of the Disclosure. Applicants submit that this amendment obviates the Examiner's objection under 35 U.S.C. § 132(a).

Rejections Under 35 U.S.C. § 103(a)—Claims 35-50, 52, and 54-59

Applicants submit that independent claim 35, as currently pending, is not unpatentable under 35 U.S.C. § 103(a) over any proper combination of Croyle, Kuze, Schomburg, Ushikubo,

EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record.

To establish a prima facie case of obviousness under 35 U.S.C. § 103(a) using multiple references, each of three requirements must be met. First, the references, when combined, must teach or suggest all the claim limitations. M.P.E.P. 2143.03 (8th ed., Rev. 3, August 2005). Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the references in a manner resulting in the claimed invention. M.P.E.P. 2143.01 (8th ed., Rev. 3, August 2005). Third, there must be a reasonable expectation of success that the proposed combination would work for the intended purpose. M.P.E.P. 2143.02 (8th ed., Rev. 3, August 2005). Moreover, the second and third requirements “must both be found in the prior art, not in applicant’s disclosure.” M.P.E.P. 2143 (8th ed., Rev. 3, August 2005).

However, Applicants submit that no proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record teaches or suggests all the limitations of claim 35 including at least “[a] high-performance tyre for a motor vehicle”, “wherein the tread band comprises a pattern, comprising[] a central region[,] first and second shoulder regions[,] and first, second, third, and fourth circumferential grooves”, “wherein the first circumferential groove divides the first shoulder region from the central region”, “wherein the fourth circumferential groove divides the central region from the second shoulder region”, “wherein the first shoulder region comprises first shoulder blocks, separated from each other by first transverse grooves, but joined to each other along axially inner ends of the first shoulder blocks by a first circumferential portion”,

“wherein the central region comprises[] a row of inner central blocks[,] first and second rows of outer central blocks[,] and first and second annular projections”, “wherein the outer central blocks of the first row are delimited on axially opposite sides by the first and second circumferential grooves”, “wherein the inner central blocks are delimited on one axial side by the second circumferential groove”, “wherein the third circumferential groove separates the first and second annular projections”, “wherein the outer central blocks of the second row are adjacent on one axial side to the second annular projection and are delimited, on an axially opposite side, by the fourth circumferential groove”, and “wherein the second shoulder region comprises second shoulder blocks, separated from each other by second transverse grooves, but joined to each other along axially inner ends of the second shoulder blocks by a second circumferential portion”.

In particular, Applicants note that JP '606 primarily appears to disclose a tyre of the non-directional type. In Fig. 1 of JP '606, this non-directional tyre includes a row of inner central blocks, but no annular projection. In Fig. 2 of JP '606, this non-directional tyre includes a single annular projection (rib R) exactly straddling the centerline of the tyre, but with no row of inner central blocks.

In stark contrast, both Kuze and JP '912 appear to disclose tyres of the directional type, but with no annular projection straddling the centerline of the tyre. Applicants note that at least Fig. 5 of Kuze appears to teach away from an annular projection straddling the centerline of the tyre, while Figs. 1 and 2 of JP '912 appear to disclose two annular projections, neither straddling the centerline of the tyre.

Thus, attempting, arguendo, to combine JP '606's non-directional tyre with either Kuze or JP '912 would appear to at least:

- (1) defeat the primarily non-directional nature of JP '606's tread pattern;
- (2) change the principle of operation of JP '606's tread pattern in that it would alter the flow path of water out from between the tyre and road; and
- (3) increase pattern noise, rendering JP '606 unsatisfactory for its intended purpose to decrease pattern noises.

Therefore, Applicants submit that it is not proper to combine JP '606 with either Kuze or JP '912, as the Examiner has attempted to do. Additionally, Applicants submit that none of the other art of record overcomes these deficiencies.

Because no proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record teaches or suggests all the limitations of claim 35, Applicants submit that claim 35 is not unpatentable under 35 U.S.C. § 103(a) over Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and the other art of record.

Applicants further submit that dependent claims 36-59 also are not unpatentable under 35 U.S.C. § 103(a) over any proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record, at least due to the direct or indirect dependency of claims 36-59 from independent claim 35.

Rejections Under 35 U.S.C. § 102(b)—Claims 60, 64-67, 72, 73, and 76

Applicants submit that independent claim 60, as amended, is not anticipated under 35 U.S.C. § 102(b) by either JP '508 or JP '606.

For anticipation under 35 U.S.C. § 102(b), the reference must teach every aspect of the claimed invention either explicitly or impliedly. See M.P.E.P. 706.02, Subsection IV (8th ed., Rev. 3, August 2005). However, Applicants submit that neither JP '508 nor JP '606 teaches every aspect of independent claim 60, including at least “[a] high-performance, directional tyre for a motor vehicle”, “wherein the tread band comprises a pattern, comprising[] a central region[,] first and second shoulder regions[,] and first, second, third, and fourth circumferential grooves”, “wherein the first circumferential groove divides the first shoulder region from the central region”, “wherein the fourth circumferential groove divides the central region from the second shoulder region”, “wherein the first shoulder region comprises first shoulder blocks, separated from each other by first transverse grooves, but joined to each other along axially inner ends of the first shoulder blocks by a first circumferential portion”, “wherein the central region comprises[] first and second rows of central blocks[] and a central annular projection”, “wherein the central blocks of the first row are delimited on one axial side by the first circumferential groove”, “wherein the second circumferential groove separates the central blocks of the first row from the central annular projection”, “wherein the second circumferential groove is immediately adjacent to the central annular projection”, “wherein the central blocks in one or both of the rows are approximately cusp-shaped”, “wherein the third circumferential groove is immediately adjacent to the central annular projection”, “wherein the third circumferential groove separates the central annular projection from the central blocks of the second row”, “wherein the central

blocks of the second row are delimited on one axial side by the fourth circumferential groove”, and “wherein the second shoulder region comprises second shoulder blocks, separated from each other by second transverse grooves, but joined to each other along axially inner ends of the second shoulder blocks by a second circumferential portion”.

In particular, Applicants understand JP '508 to disclose a tyre of the non-directional type and JP '606 to primarily disclose a tyre of the non-directional type. Additionally, although claim 73 was rejected as anticipated under 35 U.S.C. § 102(b) by both JP '508 and JP '606, the Office Action does not appear to offer any basis for either rejection. And Applicants submit that neither JP '508 nor JP '606 appears to teach “wherein the central blocks in one or both of the rows are approximately cusp-shaped”, either explicitly or impliedly.

Because neither JP '508 nor JP '606 teaches, either explicitly or impliedly, all aspects of claim 60, Applicants submit that independent claim 60 is not anticipated under 35 U.S.C. § 102(b) by either JP '508 or JP '606.

Applicants further submit that dependent claims 64-67, 72, and 76 also are not anticipated under 35 U.S.C. § 102(b) by either JP '508 or JP '606, at least due to the direct dependency of claims 64-67, 72, and 76 from independent claim 60.

Rejections Under 35 U.S.C. § 103(a)—Claims 60-76

Applicants submit that independent claim 60, as amended, is not unpatentable under 35 U.S.C. § 103(a) over any proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record.

As discussed above, to establish a prima facie case of obviousness under 35 U.S.C. § 103(a) using multiple references, each of three requirements must be met. First, the references, when combined, must teach or suggest all the claim limitations. Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the references in a manner resulting in the claimed invention. Third, there must be a reasonable expectation of success that the proposed combination would work for the intended purpose.

However, Applicants submit that no proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record teaches or suggests all the limitations of claim 60 including at least “[a] high-performance, directional tyre for a motor vehicle”, “wherein the tread band comprises a pattern, comprising[] a central region[,] first and second shoulder regions[,] and first, second, third, and fourth circumferential grooves”, “wherein the first circumferential groove divides the first shoulder region from the central region”, “wherein the fourth circumferential groove divides the central region from the second shoulder region”, “wherein the first shoulder region comprises first shoulder blocks, separated from each other by first transverse grooves, but joined to each other along axially inner ends of the first shoulder blocks by a first circumferential portion”, “wherein the central region comprises[] first and second rows of central blocks[] and a central annular projection”, “wherein the central blocks of the first row are delimited on one axial side by the first circumferential groove”, “wherein the second circumferential groove separates the central blocks of the first row from the central annular projection”, “wherein the second circumferential groove is immediately adjacent to the central annular projection”, “wherein the

central blocks in one or both of the rows are approximately cusp-shaped”, “wherein the third circumferential groove is immediately adjacent to the central annular projection”, “wherein the third circumferential groove separates the central annular projection from the central blocks of the second row”, “wherein the central blocks of the second row are delimited on one axial side by the fourth circumferential groove”, and “wherein the second shoulder region comprises second shoulder blocks, separated from each other by second transverse grooves, but joined to each other along axially inner ends of the second shoulder blocks by a second circumferential portion”.

In particular, Applicants understand JP '508 to disclose a tyre of the non-directional type and JP '606 to primarily disclose a tyre of the non-directional type. However, Applicants submit that Figs. 1-3 and 6 of Schomburg, for example, disclose a tyre of the directional type. Thus, Applicants submit that the proposed combination of either JP '508 or JP '606 with Schomburg is improper. And, Applicants submit, no proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record overcomes this deficiency.

Because no proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record teaches or suggests all the limitations of claim 60, Applicants submit that claim 60 is not unpatentable under 35 U.S.C. § 103(a) over Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and the other art of record.

Applicants further submit that dependent claims 61-72 and 76 also are not unpatentable under 35 U.S.C. § 103(a) over any proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record, at least due to the direct or indirect dependency of claims 61-72 and 76 from independent claim 60.

Rejections Under 35 U.S.C. § 103(a)—Claim 77

Applicants submit that independent claim 77, as amended, is not unpatentable under 35 U.S.C. § 103(a) over any proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record.

As discussed above, to establish a prima facie case of obviousness under 35 U.S.C. § 103(a) using multiple references, each of three requirements must be met. First, the references, when combined, must teach or suggest all the claim limitations. Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the references in a manner resulting in the claimed invention. Third, there must be a reasonable expectation of success that the proposed combination would work for the intended purpose.

However, as discussed above, Applicants submit that no proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record teaches or suggests all the limitations of claim 77 including at least “[a] high-performance, directional tyre for a motor vehicle”, “wherein the tread band comprises a pattern, comprising [] a central region[,] first and second shoulder regions[,]

and first and second circumferential grooves”, “wherein the first circumferential groove divides the first shoulder region from the central region”, “wherein the second circumferential groove divides the central region from the second shoulder region”, “wherein the first shoulder region comprises first shoulder blocks, separated from each other by first transverse grooves, but joined to each other along axially inner ends of the first shoulder blocks by a first circumferential portion”, “wherein the central region comprises rows of central blocks”, “wherein the second shoulder region comprises second shoulder blocks, separated from each other by second transverse grooves, but joined to each other along axially inner ends of the second shoulder blocks by a second circumferential portion”, “wherein the first circumferential portion forms an axially outer lateral wall of the first circumferential groove”, “wherein the second circumferential portion forms an axially outer lateral wall of the second circumferential groove”, “wherein the axially outer lateral wall of at least one of the first and second circumferential grooves has a profile, in a radial plane, that is inclined more with respect to a centerline axis of the respective circumferential groove than a profile of a facing lateral wall of the respective circumferential groove”, and “wherein the blocks in one or more of the rows of central blocks are separated from each other by transverse grooves having a bottom wall with an inclined profile decreasing towards one of the first and second circumferential grooves”.

In particular, Applicants note that JP '606 appears to disclose connecting portions 50 that substantially link up the shoulder blocks on respective sides of the tyre to provide high stiffness in lateral regions Ts. English-language translation of JP '606, p. 1/11. 37-39 (“in both the lateral regions Ts of the tyre, it is general practice in improving the steering stability to set the tyre’s stiffness high in comparison to the tyre’s central region Tc”)

In contrast, both Croyle and JP '704 appear to disclose a tread pattern wherein lateral stiffness is increased by providing circumferential grooves in which the axially outer lateral wall has a profile, in a radial plane, that is inclined more with respect to the centerline axis of the respective circumferential groove than the profile of the facing lateral wall of the respective circumferential groove. For example, Croyle discloses a tyre in which “changing angular variation of the circumferential groove walls[] permits an increase in lateral stiffness . . . without sacrificing the ground contacting surface area of the tread elements.” Croyle, c. 4/11. 49-53. Similarly, JP '704 discloses “[t]he angle $[\beta]$. . . made by the sidewall 5a at the outside . . . of the longitudinal grooves G1, G2 . . . is made larger than the angle $[\alpha]$ of the inside sidewall 5b With such arrangement, the rigidity at the tread section is improved[,] . . . [resulting] in the improvement of the steering stability” JP '704, Abstract.

Thus, Applicants submit that one of ordinary skill in the art would understand that there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine JP '606 with either Croyle or JP '704 in a manner resulting in the claimed invention. Specifically, Applicants note that connecting portion 50 in JP '606 already provides lateral stiffness in the shoulder portions to improve steering stability. Accordingly, there is no motivation to additionally provide circumferential grooves in which the axially outer lateral wall has a profile, in a radial plane, that is inclined more with respect to the centerline axis of the respective circumferential groove than the profile of the facing lateral wall of the respective circumferential groove, as there is no demonstrated need to further improve the lateral stiffness or steering stability of the tread pattern of JP '606.

Therefore, Applicants submit that it is not proper to combine JP '606 with either Croyle or JP '704, as the Examiner has attempted to do. And, Applicants submit, no proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record overcomes this deficiency.

Because no proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record teaches or suggests all the limitations of claim 77, Applicants submit that claim 77 is not unpatentable under 35 U.S.C. § 103(a) over Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and the other art of record.

New Claims 78 and 79

Applicants submit that no proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record teaches or suggests all the limitations of new independent claim 78, including at least “[a] high-performance, directional tyre for a motor vehicle”, “wherein the tread band comprises a pattern, comprising[] a central region[,] first and second shoulder regions[,] and first, second, third, and fourth circumferential grooves”, “wherein the first circumferential groove divides the first shoulder region from the central region”, “wherein the fourth circumferential groove divides the central region from the second shoulder region”, “wherein the first shoulder region comprises first shoulder blocks, separated from each other by first transverse grooves, but joined to each other along axially inner ends of the first shoulder blocks by a first circumferential portion”, “wherein the central region comprises[] first and second rows

of central blocks[] and a central annular projection”, “wherein the central blocks of the first row are delimited on one axial side by the first circumferential groove”, “wherein the second circumferential groove separates the central blocks of the first row from the central annular projection”, “wherein the second circumferential groove is immediately adjacent to the central annular projection”, “wherein the central blocks in one or both of the rows are approximately semiparabolic-shaped”, “wherein the third circumferential groove is immediately adjacent to the central annular projection”, “wherein the third circumferential groove separates the central annular projection from the central blocks of the second row”, “wherein the central blocks of the second row are delimited on one axial side by the fourth circumferential groove”, and “wherein the second shoulder region comprises second shoulder blocks, separated from each other by second transverse grooves, but joined to each other along axially inner ends of the second shoulder blocks by a second circumferential portion”.

Applicants further submit that dependent claim 79 also is not unpatentable under 35 U.S.C. § 103(a) over any proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record, at least due to the direct dependency of claim 79 from independent claim 78.

New Claims 80 and 81

Applicants submit that no proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record teaches or suggests all the limitations of new independent claim 80, including at least “[a] high-performance, directional tyre for a motor vehicle”, “wherein the tread band comprises a pattern, comprising[] a central region[,] first and second shoulder regions[,] and

first, second, third, and fourth circumferential grooves”, “wherein the first circumferential groove divides the first shoulder region from the central region”, “wherein the fourth circumferential groove divides the central region from the second shoulder region”, “wherein the first shoulder region comprises first shoulder blocks, separated from each other by first transverse grooves, but joined to each other along axially inner ends of the first shoulder blocks by a first circumferential portion”, “wherein the central region comprises[] first and second rows of central blocks[] and a central annular projection”, “wherein the central blocks of the first row are delimited on one axial side by the first circumferential groove”, “wherein the second circumferential groove separates the central blocks of the first row from the central annular projection”, “wherein the second circumferential groove is immediately adjacent to the central annular projection”, “wherein the second and third circumferential grooves comprise half-wave harmonic courses”, “wherein the third circumferential groove is immediately adjacent to the central annular projection”, “wherein the third circumferential groove separates the central annular projection from the central blocks of the second row”, “wherein the central blocks of the second row are delimited on one axial side by the fourth circumferential groove”, and “wherein the second shoulder region comprises second shoulder blocks, separated from each other by second transverse grooves, but joined to each other along axially inner ends of the second shoulder blocks by a second circumferential portion”.

Applicants further submit that dependent claim 81 also is not unpatentable under 35 U.S.C. § 103(a) over any proper combination of Croyle, Kuze, Schomburg, Ushikubo, EP '143, EP '332, GB '795, JP '105, JP '106, JP '508, JP '606, JP '704, JP '912, and/or the other art of record, at least due to the direct dependency of claim 81 from independent claim 80.

Claim Scope

In discussing the specification, claims, abstract, and drawings in this Amendment, it is to be understood that Applicants are in no way intending to limit the scope of the claims to any exemplary embodiments described in the specification or abstract and/or shown in the drawings. Rather, Applicants believe that Applicants are entitled to have the claims interpreted broadly, to the maximum extent permitted by statute, regulation, and applicable case law.

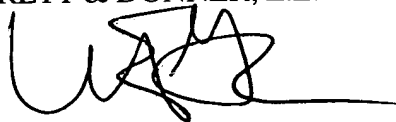
Summary

In view of the foregoing amendments and remarks, Applicants respectfully request the reconsideration and reexamination of this Application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

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Dated: December 1, 2005

By: _____

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